

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|                                      |   |                         |
|--------------------------------------|---|-------------------------|
|                                      | X |                         |
| H. CRISTINA CHEN-OSTER; SHANNA       | : |                         |
| ORLICH; ALLISON GAMBA; AND MARY DE   | : |                         |
| LUIS,                                | : |                         |
|                                      | : |                         |
| Plaintiffs,                          | : |                         |
|                                      | : |                         |
| v.                                   | : | 10 Civ. 6950 (AT) (RWL) |
|                                      | : |                         |
| GOLDMAN, SACHS & CO. and THE GOLDMAN | : |                         |
| SACHS GROUP, INC.,                   | : |                         |
|                                      | : |                         |
| Defendants.                          | : |                         |
|                                      | : |                         |
|                                      | : |                         |
|                                      | : |                         |
|                                      | X |                         |

**JOINT PROGRESS REPORT**

The Parties make this “60-day progress report[.]” pursuant to the Court’s January 30, 2018 Order concerning the schedule for Rule 23(b)(2) and (c)(4) discovery, expert reports, and briefing. (ECF No. 568 at 1.) In the Parties’ July 13, 2018 joint letter to the Court, the Parties reported on their progress and requested an adjournment in the schedule. (ECF No. 615.) By Order dated July 16, 2018, the Court approved and entered the adjusted schedule. (ECF No. 616.) The Parties are proceeding in accordance with that schedule.

\* \* \*

The Parties thank the Court for its consideration and are available to answer any questions or provide more details at the Court's convenience.

Respectfully,

/s/ Adam T. Klein

Adam T. Klein  
Cara E. Greene  
OUTTEN & GOLDEN LLP  
685 Third Avenue, 25th Floor  
New York, New York 10017  
Telephone: (212) 245-1000  
Facsimile: (646) 509-2060

Paul W. Mollica  
161 North Clark Street, Suite 4700  
Chicago Illinois 60601  
Telephone: (212) 809-7010  
Facsimile: (312) 809-7011

Kelly M. Dermody (*admitted pro hac vice*)  
Anne B. Shaver (*admitted pro hac vice*)  
Tiseme G. Zegeye  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, California 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-1008

Rachel Geman  
250 Hudson Street, 8th Floor  
New York, New York 10013-1413  
Telephone: (212) 355-9500  
Facsimile: (212) 355-9592

*Attorneys for Plaintiffs*

/s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.  
Theodore O. Rogers, Jr.  
Ann-Elizabeth Ostrager  
Joshua S. Levy  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588

Barbara B. Brown (*admitted pro hac vice*)  
Neal D. Mollen (*admitted pro hac vice*)  
Carson H. Sullivan (*admitted pro hac vice*)  
PAUL HASTINGS LLP  
875 15th Street, NW  
Washington, DC 20005  
Telephone: (202) 551-1700

*Attorneys for Defendants*